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14  
15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 FEDERAL TRADE COMMISSION,  
19 Plaintiff,

20 v.

21 MICROSOFT CORP.,  
and  
22 ACTIVISION BLIZZARD, INC.

23 Defendants.  
24  
25  
26

Case No. 3:23-cv-02880-JSC

**DECLARATION OF PAGE ROBINSON IN  
SUPPORT OF DEFENDANT ACTIVISION  
BLIZZARD, INC.'S STATEMENT IN  
RESPONSE TO PLAINTIFF FEDERAL  
TRADE COMMISSION'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED (Civil L.R. 79-5(f)) [ECF NO. 35]**

Judge: Hon. Jacqueline Scott Corley

1 I, Page Robinson, declare as follows:

2 1. I am a Senior Director of Litigation and Intellectual Property at Activision  
3 Blizzard, Inc. (“Activision”). I submit this declaration in support of Activision’s Statement  
4 in Response to Plaintiff Federal Trade Commission’s Administrative Motion to Consider  
5 Whether Another Party’s Material Should be Sealed. In my role, I have personal  
6 knowledge of Activision’s use and protection of non-public, highly sensitive, and  
7 confidential business information, including the information at issue here.

8 2. I have personal knowledge of the facts set forth below, and I can and would  
9 competently testify to such facts if called to do so.

10 3. I have reviewed and am familiar with the portions of Plaintiff’s Notice of  
11 Motion and Emergency Motion For Temporary Restraining Order (“TRO”), the  
12 Declaration of Jennifer Fleury, along with the exhibits filed in support thereof that Plaintiff  
13 filed under seal because they contained information designated by Activision as  
14 “Confidential.” Such information is identified in Plaintiff’s Administrative Motion to  
15 Consider Whether Another Party’s Material Should be Sealed (ECF No. 35) (the  
16 “Administrative Motion”).

17 4. As set forth in the Statement in Response to the Administrative Motion,  
18 some of the portions identified in Plaintiff’s Administrative Motion contain non-public and  
19 highly sensitive information, including, but not limited to, information reflecting  
20 confidential internal business data, revenue figures and projections, business strategy and  
21 planning, assessments of the competitive landscape, internal decision-making processes,  
22 strategic evaluation of forward-looking opportunities, and market share analyses.

23 5. As further set forth in the Statement in Response to the Administrative  
24 Motion, some of the portions identified in Plaintiff’s Administrative Motion contain non-  
25 public and highly sensitive information, including, but not limited to, information  
26 reflecting the terms of, and negotiations regarding, confidential agreements that Activision  
27 does not disclose to third parties.

28



**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: June 20, 2023

/s/ Caroline Van Ness  
Caroline Van Ness